

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

TRADING PLACES INTERNATIONAL, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 6:15-cv-03092-BP
)	
SUMMERWINDS RESORT SERVICES, LLC,)	
ET AL.,)	
)	
Defendants.)	

MOTION FOR EXTENSION OF DISCOVERY DEADLINE

COMES NOW Plaintiff Trading Places International, LLC (“TPI”) by and through its counsel of record, Lathrop & Gage, LLP and for its Motion for Extension of Discovery Deadline states to the Court as follows:

1. This case was filed by TPI on February 27, 2015.
2. A Joint Scheduling Order was entered by this Court on July 1, 2015 and amended on April 15, 2016 and again on June 7, 2016.
3. Trial is currently set for 8:30 a.m. on June 5, 2017 at the United States District Courthouse in Springfield, Missouri.
4. Discovery is currently scheduled to close on January 31, 2017.
5. Although the parties have diligently taken depositions, exchanged electronic discovery and exchanged paper discovery, significant additional discovery remains to be completed.
6. TPI believes that discovery should be extended until March 31, 2017, which is approximately an additional sixty (60) days.
7. No party will be harmed by this extension of the discovery deadline

8. Defendants have been consulted that TPI is requesting this Court grant the extension of discovery.

9. Additionally, an extension will not impact the deadline for dispositive motions as, after discovery to date, counsel for all parties believe that it is unlikely any dispositive motions will be filed in this matter.

WHEREFORE, Plaintiff Trading Places International, LLC prays for an order of this Court amending the Second Amended Scheduling Order and extending the discovery deadline until March 31, 2017 and for such other and further relief as this Court deems just under the circumstances.

Respectfully Submitted,

Dated: January 12, 2017

LATHROP & GAGE LLP

By: /s/ James E. Meadows

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a complete copy of the foregoing was electronically filed this 12th day of January, 2017, with the Clerk of the Court using the e-filing system which sent notification of such filing to the following:

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